

## UNITED STATES DISTRICT COURT

for the

Northern District of Oklahoma

United States of America

v.

JOSE TRUJILLO

*Defendant(s)*

Case No.

17-mj-139-PJL

**FILED**  
 AUG 22 2017  
 Mark C. McCart, Clerk  
 U.S. DISTRICT COURT

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Beginning in 12/2016 to present in the county of Tulsa in the  
 Northern District of Oklahoma, the defendant(s) violated:

*Code Section*

18 U.S.C. § 875(c)

18 U.S.C. § 844(e)

*Offense Description*

Transmitting Interstate and Foreign Commerce any Communication  
 Containing any Threat to Injure the Person of Another;  
 Willfully Making a Threat and Maliciously Conveying False Information  
 Knowing the Same to be False Concerning an Attempt and Alleged Attempt  
 being Made and to Be Made to Kill, Injure and Intimidate any Individual and  
 Unlawfully to Damage and Destroy any Building by Means of Fire and  
 Explosive, Through the use of Mail, Telephone, Telegraph, and other  
 instrument of Interstate and Foreign Commerce, and in and Affecting  
 Interstate and Foreign Commerce;

This criminal complaint is based on these facts:

See attached Affidavit by Steven Carnevale, Special Agent, FBI

☒ Continued on the attached sheet.*Complainant's signature*

SA STEVEN CARNEVALE, FBI

*Printed name and title*

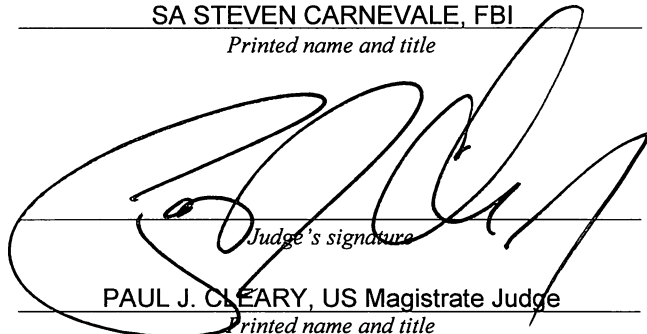
Sworn to before me and signed in my presence.

Date:

8/22/2017

City and state:

Tulsa, Oklahoma

  
*Judge's signature*  
 PAUL J. CLEARY, US Magistrate Judge  
*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Stephen Carnevale, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am Special Agent with the Federal Bureau of Investigation (FBI) and am currently assigned to the Oklahoma City Division, Tulsa Resident Agency, on the Joint Terrorism Task Force. As a Special Agent, my duties include, but are not limited to, investigating violations of federal criminal law and threats to national security. My law enforcement career began in August of 2009 with the United States Marshals Service as a Deputy United States Marshal. I have been employed as an FBI Special Agent since January of 2016. In addition to formal training, I have also received extensive training through my involvement in numerous investigations from working alongside experienced law enforcement officers. My investigations into violations of federal criminal law, include, but are not limited to bank robberies, illegal narcotics trafficking, bombings, and terrorism related offenses.

2. I am familiar with the facts and circumstances of this case. The facts set forth in this affidavit are based on my personal observations, knowledge obtained from other law enforcement officers, my review of documents related to this investigation, oral and written communications with others who have personal knowledge of the events and circumstances described herein, and a review of public source information including information available on the Internet. Because this affidavit is submitted for the limited purposes of establishing probable cause, it does not set forth each and every fact that I or others have learned during the course of this investigation.

3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that **JOSE RAWDON TRUJILLO** violated federal laws including, but not limited to the following:

- transmitting in interstate and foreign commerce any communication containing any threat to injure the person of another, in violation of Title 18 U.S.C. 875(c); and
- willfully making a threat and maliciously conveying false information knowing the same to be false concerning an attempt and alleged attempt being made and to be made to kill, injure and intimidate any individual and unlawfully to damage and destroy any building by means of fire and explosive, through the use of the mail, telephone, telegraph, and other instrument of interstate and foreign commerce, and in and affecting interstate and foreign commerce, in violation of Title 18 U.S.C. 844(e).

#### **PROBABLE CAUSE**

4. According to Tulsa County Sheriff's Office report 2017-07440, which was filed on 08/03/2017, 720-388-2123 is a phone number known to be used by TRUJILLO.

5. According to the Tulsa Regional Automated Crime Information System (TRACIS), in a report 2016079902 filed on December 21, 2016, phone number 720-388-2123 belonged to JOSE TRUJILLO according to an interview conducted with TRUJILLO's family.

6. According to open source information, phone number 720-388-2123 is associated with Facebook account number 1356397624. The address associated with this Facebook page is [www.facebook.com/JT.tilesetter40](http://www.facebook.com/JT.tilesetter40). The name associated with this Facebook account number is Joey Trujillo. Your affiant reviewed the pictures associated with this account on 08/21/2017. Your affiant recognized the white male depicted in the pictures as TRUJILLO.

7. On April 24, 2017 an individual later identified as JOSE TRUJILLO called the Tulsa County Sheriff's Office (TSCO) and spoke with the dispatcher. The dispatcher said that TRUJILLO stated that if the Captain did not take care, he (Trujillo) was going to "drive to Oklahoma and plant a bomb inside the Sheriff's Office and blow it up like 9/11." Dispatch advised the phone call came from 720-388-2123. A Tulsa County Sheriff's Deputy called back the number

provided by dispatch. The individual who answered the phone identified himself as JOEY TRUJILLO. TRUJILLO complained about the “chips” that were implanted in him by Tulsa County. The Deputy explained to TRUJILLO that TCSO does not implant chips in people and that the TSCO could send someone to talk with TRUJILLO. TRUJILLO said that if they (TSCO) came to him he (Trujillo) would cut their throats and cut their heads off. TRUJILLO further said that if they (TSCO) didn’t take care of this he was going to blow the Sheriff’s Office up. TRUJILLO stated that he hoped they (TSCO) were taking him (Trujillo) seriously because he was not joking.

8. On May 3, 2017 at approximately 1:30 PM the United States Marshals Service (USMS) in the Northern District of Oklahoma received a phone call from an individual identified as JOSE TRUJILLO. TRUJILLO identified himself to the Deputy United States Marshal (DUSM) who answered the phone. At the end of the phone conversation TRUJILLO threatened to blow up the building. According to the USMS, JOSE TRUJILLO is known to them and they have had phone contact in the past.

9. On June 21, 2017, Tulsa Police Department investigated a bomb threat at the Akdar Shrine, 2808 S. Sheridan Road, Tulsa, Oklahoma. On or about June 20, 2017, Facebook user Joey Trujillo, [www.facebook.com/JT.titlesetter40](https://www.facebook.com/JT.titlesetter40), made the following threats on the Akdar Shrine website:

- “You know I’m going to blow your buildings up right”
- “Sleep with “one eye” open your nasty bastards.... See your around clowns”
- “You like to kill little girls and finger them while they’re dead and masturbate your fucking nasty bastards. I will reveal all your secrets to this Nation. You have messed with the wrong guy mother fuckers. I’m the guy who you mother fuckers sit around and worships my brain you sick mother fuckers. I will kill you all one by one UNTIL I blow your fucking building apart. I might even cut you from ear to ear and gut you like your worshipful master did to the innocent child who was gutted and then finger fucked while she was dead. I will kill you mother fuckers. Plan on

explosions going off during your closet parades... You never know who is watching you you sick bastards.”

10. On June 27, 2017 at 1:46 PM the Clerk’s Office for the Northern District of Oklahoma received a phone call from JOE TRUJILLO. TRUJILLO was very irate and said “you stupid fucking bitch, you tell everyone to get out of the federal building to get out, it’s about to go up in flames.” The clerk asked the caller what his name was, and the caller said his name was JOE TRUJILLO.

11. On June 28, 2017 at 11:06 AM the TCSO received a phone call from 720-388-2123, which caller ID identified as JOEY TRUJILLO. TRUJILLO was very irate and said to the TCSO employee that if he was not able to speak to a detective he would cut the employee’s head off. The employee hung up the phone. At 11:08 TRUJILLO called back and said that if he was not able to talk to a detective, he (Trujillo) would blow up the employee’s house and that he (Trujillo) knew where the employee lived.

12. On June 28, 2017 at 1:51 PM the Tulsa County Courthouse received a phone call from 720-388-2123, a number know to be used by JOSE TRUJILLO. TRUJILLO said to the employee of the courthouse that he wanted to talk to District Attorney Steve Kunzweiler. TRUJILLO further said that he was the one making the bomb threats to TCSO, and that he (Trujillo) wanted the “tracking chips” taken out of his leg.


13. On August 3, 2017 at approximately 8:30 AM TSCO received a call from 720-388-2123. The caller ID at TSCO identified the phone number as belonging to TRUJILLO. TRUJILLO said to the Deputy who answered the call that he (Trujillo) was coming back to Tulsa to kill him, and that a war was coming. TRUJILLO further said that he was going to kill the Deputy’s mom and dad. According to TSCO report 2017-07440, 720-388-2123 is a phone used by JOSE RAWDON TRUJILLO.

14. On August 8, 2017 at 12:33 AM TSCO received a call from 720-388-2123, a number known to be used by JOSE TRUJILLO. TRUJILLO said that he was going to put a bomb at the Sheriff's Office because he was "pissed" that TSCO had put a chip in his eye and leg. TRUJILLO further said that he was coming to Tulsa in a blue Chevrolet Suburban in two weeks, and that he would kill any trooper that tries to stop him.

15. In summary, your affiant believes that due to the aforementioned facts that there is probable cause that Jose Rawdon TRUJILLO violated the following federal statutes:

DATE	VIOLATION(S)	VICTIM LOCATION
April 24, 2017	Sections 875(c) and 844(e)	Tulsa County Sheriff's Office
May 3, 2017	Section 844(e)	U.S. Marshals Service (Tulsa)
June 27, 2017	Section 844(e)	U.S. Court Clerk (Tulsa)
June 28, 2017	Section 875(c)	Tulsa County Sheriff's Office
August 3, 2017	Section 875(c)	Tulsa County Court House
August 8, 2017	Section 844(e)	Tulsa County Sheriff's Office

16. Based on the foregoing I request that the Court issue the proposed arrest warrant for TRUJILLO.

  
 Stephen Carnevale, Special Agent  
 Federal Bureau of Investigations

Sworn and subscribed before me this 22<sup>nd</sup> day of August, 2017.

  
 UNITED STATES MAGISTRATE JUDGE